

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION  
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In re:

Ingersoll Financial, LLC

Debtor.

Case No.: 6:17-bk-07077-KSJ  
Chapter 11

**DEBTOR'S OBJECTION TO  
CLAIM NO. 135 FILED BY CITY OF CINCINNATI**

**NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING**

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within 30 days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at George C. Young Federal Courthouse, 400 West Washington Street, Suite 5100, Orlando, FL 32801, and serve a copy on the movant's attorney, Frank M. Wolff, Frank Martin Wolff, P.A., 19 E. Central Blvd., Orlando, FL 32801 and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing, or consider the response and grant or deny the relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

Ingersoll Financial, LLC (the "Debtor"), objects to proof of claim number 135 filed by City of Cincinnati and states as follows:

1. Chapter 11 Case. On November 7, 2017, the Debtor filed this Chapter 11 case (the “Petition Date”).

2. Business of Debtor. Debtor is a Florida limited liability company formed February 27, 2012, with its office located at office at 2 South Orange Avenue, Suite 202, Orlando, FL 32801. The Debtor’s business has been to acquire distressed properties and re-sell them to the public.

3. Proof of Claim. On September 7, 2018, City of Cincinnati (the “Creditor”) filed claim number 135 as a secured claim in this case in the amount of \$16,250.00.

4. Basis of Objection. There documentation attached to the Claim references 3 properties:

- a. 1216 Gilsey Av, amount due: \$5,000
- b. 1128 Mansion Av, amount due \$5,000; and
- c. 1755 Denham St., amount due \$6,250.00.

The property located at 1755 Denham St. is not owned by the Debtor but is owned by Ingersoll Financial No. 41 Land Trust. Accordingly, the amount due with regard to 1755 Denham St. should be disallowed and Claim no. 135 should be allowed in the amount of \$10,000.00.

Relief Requested

For the reasons stated above, the Debtor requests entry of an order (1) sustaining this objection; (2) determining that Claim no.35 is allowed in the amount of \$10,000; and (3) any other relief the Court deems appropriate.

Certificate Of Service

I certify that this objection to claims has been served on October 8, 2018: (i) on all filing users through the CM/ECF filing system; and (ii) by first class United States mail, postage prepaid, to City of Cincinnati, Attn: Code Enforcement, 805 Central Ave, Suite 500, Cincinnati, OH 45202; and (iii) by first class United States mail, postage prepaid, and email to City of Cincinnati, City Treasurer's Office, Attn: Rajesh Ranjit, Senior Accountant, 801 Plum St, Room 202, Cincinnati, OH, 45202, email: [rajesh.ranjit@cincinnati-oh.gov](mailto:rajesh.ranjit@cincinnati-oh.gov) and [catherine.chapman@cincinnati-oh.gov](mailto:catherine.chapman@cincinnati-oh.gov).

/s/ Frank M. Wolff

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